

March 24, 2008

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Suite TW-A325
Washington, D.C. 20554

Re: WC Docket Nos. 07-243, 07-244; FCC Docket No. 07-188, Telephone Number
Requirements for IP-Enabled Services Providers; Local Number Portability
Porting Interval and Validation Requirements

Dear Ms. Dortch:

Enclosed please find the Connecticut Department of Public Utility Control's
comments filed in response to the Federal Communications Commission's
(Commission) Notice of Proposed Rulemaking adopted by the Commission on October
31, 2007.

Sincerely,

DEPARTMENT OF PUBLIC UTILITY CONTROL

Louise Rickard
Acting Executive Secretary

Enc.

COMMENTS OF THE CONNECTICUT DEPARTMENT OF PUBLIC UTILITY CONTROL

The Connecticut Department of Public Utility Control (CTDPUC) hereby submits the following comments in response to the Federal Communications Commission's (Commission) Notice of Proposed Rulemaking (NPRM) adopted by the Commission on October 31, 2007 in the above noted proceedings. In the NPRM, the Commission seeks comment on whether it should extend other numbering-related obligations to interconnected Voice over the Internet Protocol (VoIP) providers and other IP-enabled providers. The Commission also seeks comments regarding whether it should adopt specific rules regarding the local number portability (LNP) validation process and porting interval lengths.

A. LNP REQUIREMENTS

The CTDPUC believes that the Commission's Part 52 rules and requirements should be imposed equally on all entities obtaining numbering resources directly from the North American Numbering Plan Administrator (NANPA) or the Pooling Administrator (PA). Many of the VoIP and other IP-enabled service providers using telephone numbering resources do not receive their numbers directly from the NANPA or the National Pooling Administrator. Instead, they are allocated to those providers as customers of Commission-licensed or State-certificated carriers. For example, when a block of one-thousand numbers is transferred from the competitive local exchange carrier (CLEC) to a VoIP or IP-enabled provider customer, the CLEC considers this block of assigned numbers as being 100% utilized even though it does not regard it as a block of subscribers or access lines in service. Thus, the total assigned telephone numbers and utilization rates increase while CLEC subscribership decreases.

Consequently, VoIP and other IP-enabled providers should be subject to the same obligations as other providers to include, but not be limited to, requiring periodic reporting on the usage of numbering resources, and utilization and months-to-exhaust standards for obtaining new numbering resources.

The Commission has delegated numbering administration authority to the states. The CTDPUc believes that such delegation has created an efficient and manageable system for reviewing telephone numbering resources and availability. This delegation of authority also permits each state commission to assess service providers' applications for numbering resources and to verify that they are in compliance with state and Federal requirements. In the opinion of the CTDPUc, the states should also be permitted to impose on VoIP and IP-enabled service providers the same obligations currently imposed on traditional carriers seeking numbering resources. In particular, the states should have the authority to address any issues resulting from the inefficient number assignment and use, accelerated area code exhaust, and delayed or incorrect number ports between service providers relative to VoIP and IP-enabled service providers. Clearly, it would be prudent for the Commission to continue delegating these numbering responsibilities to the individual state commissions.

B. PORTING INTERVALS

The CTDPUc also supports the Commission's efforts to reduce the porting interval for wireline-to-wireline and intermodal simple port requests from the current four day interval to 48 hours. However, the CTDPUc suggests that this time interval be reviewed at a later date with possibility of further reducing the porting interval to one business day as conditions warrant.

As the Commission is aware, the current porting interval has been in place for almost 10 years and that the use of electronic interfaces has made it technically feasible to complete simple ports between wireline service providers on a next-day basis. The CTDPUc notes that porting between wireless service providers is typically accomplished within two and one-half hours using the same industry database that is used for wireline porting. In light of the wireless service providers' porting time interval, it is not unreasonable to expect the wireline industry to shorten its porting time interval for simple ports. The CTDPUc is concerned that service providers are competitively disadvantaged and consumers inconvenienced when not permitted to promptly transfer existing numbers to competing service providers. Accordingly, the CTDPUc recommends that at a minimum, the porting interval for simple ports be initially reduced to 48 hours and eventually to a one business day interval when requested by electronic interface.

C. CONCLUSION

The CTDPUc continues to support the Commission's efforts in resolving the number porting outlined in its NPRM. The CTDPUc believes that adoption of its

comments will lead to an equitable extension of the Commission's numbering obligations on all carriers seeking access to numbering resources.

Respectfully submitted,

CONNECTICUT DEPARTMENT OF
PUBLIC UTILITY CONTROL

Donald W. Downes
Chairman

John W. Betkoski, III
Vice-Chairman

Anne C. George
Commissioner

Anthony J. Palermino
Commissioner

March 24, 2008

Connecticut Department of
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Ten Franklin Square
New Britain, CT 06051

CERTIFICATION

Miriam L. Theroux
Commissioner of the Superior Court